1	Christian Gabroy
	(#8805)
2	Kaine Messer
	(#14240)
3	GABROY MESSER
	The District at Green Valley Ranch
4	170 South Green Valley Parkway
	Suite 280
5	Henderson, Nevada 89012
	Tel (702) 259-7777
6	christian@gabroy.com
	kmesser@gabroy.com
7	Attorneys for Plaintiff
	Susan Finucan
8	
	UNITED S
9	l DIS

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SUSAN FINUCAN, an individual,

Plaintiff,

VS.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

CITY OF LAS VEGAS, a political subdivision of the State of Nevada; SCOTT ADAMS, individually and in his official capacity; DOES 1 through 10; and ROE Corporations 11 through 20, inclusive;

Defendants.

Case No. 2:21-cv-0198-CDS-DJA

STIPULATION AND ORDER TO EXTEND JOINT PRETRIAL ORDER DEADLINE

(Fifth Request)

STIPULATION AND ORDER TO EXTEND JOINT PRETRIAL ORDER DEADLINE

The parties by and through their respective attorneys of record hereby stipulate to an extension up to and including May 18, 2023 to file the joint pretrial order. The joint pretrial order is currently due on May 1, 2023. ECF No. 26, p. 2. To date, the parties are working and conferring to complete the joint pretrial order to completion and finalization. Per LR IA 6-1, this is the fifth request for an extension to file the joint pretrial order. Plaintiff has requested an extension to May 11, 2023 and Defendant has agreed to an extension but proposed May 18, 2023, to which Plaintiff has agreed

Good cause exists for such extension. Previously this honorable Court was made aware that Plaintiff's counsel's immediate family member had suffered a medical Page 1 of 3

emergency, requiring intubation, and that this family emergency required a great deal of
Plaintiff's lead counsel's immediate time and attention. Further, Plaintiff's counsel had
travels scheduled to see his father-in-law who is suffering congestive heart failure but
that travel was cancelled. Simultaneously, a key employee required leave to deal with a
debilitating medical condition. Finally, Plaintiff's lead counsel has also had to travel to our
state capital for an exigent legal matter which similarly is requiring significant time and
attention.

Despite such circumstances, the parties have remained diligent and substantial progress has been achieved. Plaintiff's counsel herein initially presented to Defendants' counsel a draft joint pretrial order. Defendants' counsel has since presented Plaintiff's counsel with their proposed revisions to such draft. Currently, the parties are currently working towards a finalized version which fully encompasses all the issues in this matter.

Accordingly, the parties stipulate to extending the deadline to file the Joint Pretrial Order to May 18, 2023.

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28

Attorneys for Plaintiff

GABROY | MESSER
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

This request is respectfully sought in good faith and is not sought for any improper purpose or other reason of delay. No party is prejudiced by the requested extension.

IT IS SO STIPULATED.

Dated: May 1, 2023	Dated: May 1, 2023
Respectfully submitted,	Respectfully submitted,

/s/ Christian Gabroy	/s/ Nechole Garcia
----------------------	--------------------

73/ Offitstiatt Cabiby	73/ Necrioic Garcia
Christian Gabroy	Bryan K. Scott
(#8805)	(#4381)
Kaine Messer	Jeffrey L. Galliher
(#14240)	(#8078)
The District at Green Valley Ranch	Nechole M. Garcia
170 South Green Valley Parkway	(#12746)
Suite 280	495 South Main Street
Henderson, Nevada 89012	Sixth Floor
Tel (702) 259-7777	Las Vegas, Nevada 89101
christian@gabroy.com	Tel (702) 229-6629
kmesser@gabroy.com	ngarcia@lasvegasnevada.gov

IT IS SO ORDERED.

DANIEL J. ALBREGTS UNITED STATES MAGISTRATE JUDGE

Attorney for Defendants

DATED: May 3, 2023